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June 7, 1994

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

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JUN 7 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:)	
)	
Administration of the)	CC Docket No. 92-237
North American Numbering Plan)	Phases One and Two

Dear Mr. Caton,

Enclosed please find an original and nine copies of Cincinnati Bell Telephone's Comments on the above referenced proceeding.

Please date stamp and return the enclosed duplicate copy of this letter as acknowledgement of its receipt. Questions regarding this document may be directed to Mrs. Judith Gardner at the above address or by calling (513) 397-6183.

Sincerely,

Cheryl N. Campbell

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Administration of the North) CC Docket No. 92-237
American Numbering Plan) Phases One and Two

COMMENTS OF
CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company ("CBT") respectfully submits the following comments in response to the Commission's April 4, 1994 Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.¹

PHASE ONE

A. New Administrator

The Commission's October 29, 1992 Notice of Inquiry ("NOI") in this proceeding sought comment on whether Bellcore should continue as administrator of the North American Numbering Plan ("NANP") or be replaced by another entity. Since that time, however, Bellcore has notified the Commission that it no longer desires to be the NANP administrator. As a result, the Commission is considering existing, non-government entities such as the Alliance for Telecommunications Industry Solutions ("ATIS") as possible candidates to

¹ Administration of the North American Numbering Plan, CC Docket No. 92-237, Phases One and Two, Notice of Proposed Rulemaking, (FCC 94-79), released April 4, 1994.

administer the NANP. The NPRM specifically seeks comment on whether ATIS or some component of ATIS could handle future NANP administration.²

CBT supports the appointment of ATIS as the new NANP administrator. As noted by the Commission, ATIS (formerly the Exchange Carrier Standards Association) was originally established to set and coordinate industry standards and has considerable knowledge of numbering issues through the activities of its various committees and forums.³ Because of its experience in building industry consensus on various issues, CBT submits that ATIS is uniquely qualified to administer the NANP. This experience, coupled with its extensive knowledge of numbering issues, makes ATIS an excellent choice for the new NANP administrator, and would ensure a smooth transition.⁴ Finally, the fact that ATIS recently expanded its governing board and membership to include non-LECs indicates that ATIS is not too closely identified with any particular industry segment to administer the NANP in a fair and impartial manner.

² NPRM at para. 15.

³ Id.

⁴ However, given the contentious nature of administering numbering resources in a competitive environment, the Commission must provide direction on a procedure for the timely resolution of disputes. The new NANP administrator cannot be expected to sponsor an oversight committee on numbering policy until such a procedure is established.

B. Functions of the New NANP Administrator

The Commission has tentatively concluded that the new NANP administrator should not only assume those functions customarily performed by Bellcore but should also perform the additional functions associated with the assignment of central office ("CO") codes.⁵

While CBT agrees with that tentative conclusion, an expansion in the scope of the new administrator's responsibilities at this time would not be prudent. The transition of responsibility from Bellcore to the new administrator will be complicated enough without the additional complexities associated with administering the assignment of CO codes in each NPA. Such administration should include all the functions currently associated with CO code assignment (e.g., COCUS, Code Relief, etc.) since it would be impossible for the current administrators to forecast NPA exhaust without knowing the assignment of all the NXXs within an NPA. CBT submits that in light of these complexities there is no need to transfer responsibility for assigning CO codes to the new NANP administrator at this time. Assignments should continue to be made in accordance with the industry's recently adopted guidelines for the administration of CO codes until Bellcore's current responsibilities are successfully transferred to the new NANP administrator.

⁵ NPRM at para. 29.

C. Funding for NANP Administration

The NPRM seeks further comment on how the costs of NANP administration should be recovered in the future.⁶ CBT agrees that any new funding mechanism adopted by the Commission should stress the importance of a fair and equitable allocation of the costs to all entities that use the numbers or otherwise benefit from the related number planning, implementation and administration.⁷ CBT submits that the establishment of a new numbering administration fund supported by mandatory contributions would be the best way to fund NANP administration in the future.

PHASE TWO

D. Interstate IntraLATA Toll Calls

The NPRM seeks comment on whether the Commission should require LECs to cease screening and completing interstate intraLATA "1+" MTS calls and, instead, deliver those calls to the carrier preselected by the end user unless the preliminary routing numbers indicate otherwise.⁸ CBT submits that a number of factors must be considered in deciding whether this should be done. For example, if the Commission were to mandate such a requirement, steps would have to be taken to ensure consistency between state and federal policies, and to minimize customer confusion. In addition, the Commission would have to

⁶ NPRM, at para. 31-38.

⁷ NPRM, at para. 31.

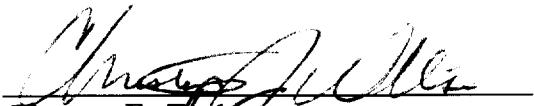
⁸ NPRM, at para. 58.

provide a mechanism whereby the costs of implementing and administering such a requirement could be recovered by the LECs.

Respectfully submitted,

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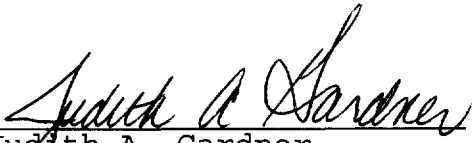
Attorneys for Cincinnati Bell
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Dated: June 7, 1994

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CERTIFICATE OF SERVICE

I, Judith A. Gardner, do hereby certify on this 7th day of June, 1994, that I have caused a copy of the foregoing Cincinnati Bell Telephone Company's Comments to be mailed, via first class United States Mail, postage paid, to the persons listed on the attached service list.


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